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Via Electronic Case Filing

Honorable Arun Subramanian  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 15A  
New York, NY, 10007

Re: *Wang v. The Philharmonic-Symphony Society of New York, Inc. et al*  
Case No. 1:24-cv-03356 (AS) (RWL) [Rel: Case No. 1:24-cv-03348 (AS)  
(RWL)]

Dear Judge Subramanian:

This firm is counsel to Defendant Associated Musicians of Greater New York, Local 802, American Federation of Musicians (“Local 802”) in the above-referenced matter. We write in opposition to the October 30 request by Plaintiff Liang Wang to file under seal certain portions of his reply to the Rule 56.1 Response of Defendant The Philharmonic-Symphony Society of New York, Inc. (the “Society”). *See* Docket No. 61.

The single sentence that Plaintiff identifies for redaction appeared first in the Society’s Response to Plaintiff’s Rule 56.1 Statement, not Plaintiff’s Reply to Plaintiff’s Rule 56.1 Statement. The Society’s Response to Plaintiff’s Rule 56.1 Statement was already publicly filed on September 18, 2024. *See* Docket No. 52.

Plaintiff has failed to set forth any meaningful basis for disregarding the strong presumption in favor of public access to judicial documents. Additionally, Local 802, a labor organization that is accountable to its members, does not believe it is appropriate to hide from its members an arbitration award that was the product of an arbitration proceeding funded exclusively by their dues. Although the parties to the arbitration agreed to keep certain documents and testimony confidential, Local 802 is not aware of any confidentiality agreement as to the contents of the arbitration award itself, and Plaintiff has produced no such agreement.

The quotation at issue does not identify any witnesses to the arbitration by name, but simply addresses the basis for Wang’s termination in 2018. Other portions of the Award are



Page 2

quoted in the same document, yet Plaintiff does not request redaction of these statements. *See e.g. id.* at 6, *see also* Docket No. 62 at 9.

Accordingly, Local 802 respectfully requests that the Court deny Plaintiff's request to file portions of his Reply to the Society's Response to Plaintiff's Rule 56.1 Statement under seal.

Respectfully submitted,

*/s/ Olivia R. Singer*

Olivia R. Singer

CC: All Counsel of Record (via ECF)